

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA, )  
)  
Plaintiff/Counterdefendant, )  
)  
PUEBLO OF SANTA CLARA, )  
)  
Plaintiff-Intervenor/Counterdefendant )  
)  
v. )  
)  
CITY OF ESPAÑOLA, )  
)  
Defendant/Counterclaimant. )  
\_\_\_\_\_ )

16-cv-00391-JCH-LAM

**JOINT MOTION TO STAY LITIGATION**

All parties- the United States of America, the Pueblo of Santa Clara and the City of Española- respectfully request that the Court stay the litigation of this case, including all deadlines, so that the case can be referred to Court-annexed settlement negotiations, stating as grounds:

1. The parties have a good-faith interest in and mutual desire to settle this case, and mutually believe that the time and resources of the Court and all parties will most productively be utilized to resolve issues presented by this case and potentially related issues as well;
2. The parties agree that settlement is feasible through a Court-annexed settlement process;
3. The parties will be prepared to suggest and agree upon one or more United States District Judge(s) or United States Magistrate Judge(s) of the District of New Mexico to preside over and facilitate settlement discussions in this case;

4. Because the parties have demonstrated a good faith interest in exploring settlement and this Court possesses the inherent authority to issue a stay as a means of controlling its docket and promoting efficient use of judicial resources, *Landis v. North American Co.*, 299 U.S. 248, 254- 55 (1936), entry of a stay under the circumstances presented is well-taken.

5. Should the parties determine that settlement is not feasible, they will so notify the Court and ask that the stay be dissolved.

Respectfully submitted,

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/s/

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